

# Exhibit G

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WASHINGTON:

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

NWDC RESISTANCE AND COALITION OF  
ANTI-RACIST WHITES,

PLAINTIFFS,

VS

CASE NO. 3:18-CV-05860-JLR

IMMIGRATION AND CUSTOMS ENFORCEMENT, TAE D.  
JOHNSON, IN HIS OFFICIAL CAPACITY AS ACTING  
DIRECTOR OF IMMIGRATION AND CUSTOMS ENFORCEMENT;  
AND ALEJANDRO MAYORKAS, IN HIS OFFICIAL CAPACITY  
AS SECRETARY OF HOMELAND SECURITY,

DEFENDANTS.

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DEPOSITION BY ZOOM,  
AND HOSTED BY COUNTY COURT REPORTERS, OF  
LEAH MONTANGE

WEDNESDAY, AUGUST 23, 2023  
10:03 A.M.

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1 A. No, because he had been arrested on a  
2 DUI years prior, right, no months prior, and he,  
3 ICE wasn't taking any action, and they took  
4 action 36 hours after he spoke about ICE.

5 Q. Okay, and are you aware of his current  
6 status?

7 A. No. I'm not.

8 Q. Claudia Rueda, what is CARW's  
9 understanding of her alleged...

10 A. I think this was the daughter, I think  
11 this is the one where she was, her mom was  
12 detained. Yeah. And then, so then she became an  
13 activist around immigration enforcement in  
14 defense of her family member who had been  
15 detained, which takes a lot of bravery.

16 Q. And so...

17 A. I remember, I remember reading about  
18 this case, this is another one that I remember  
19 first learning about from a pleading in our  
20 lawsuit in 2018 and then reading more about it.

21 Q. Okay.

22 A. Yeah. And just, it's just so sad.

23 Q. And so, what did...

24 A. He, they denied her bond, they didn't  
25 give her bond.

1 **Q. The Immigration Judge?**

2 **A. Yeah.**

3 **MR. SWIFT:** Ms. Montange, please  
4 refrain from interrupting when counsel is  
5 speaking so that we can have a clear record here.

6 **DEPONENT:** Appreciate it. Sorry.

7 **Q. Yeah, to make, to clarify things, what**  
8 **exactly, so CARW is saying that she engaged in**  
9 **speech how exactly?**

10 **A. She engaged in protests.**

11 **Q. Okay, against ICE?**

12 **A. For her mother's release.**

13 **Q. Okay. Okay.**

14 **A. In defense of her mother.**

15 **Q. And then as a result, how was she**  
16 **allegedly targeted?**

17 **A. Shortly after her mother's release, she**  
18 **was arrested.**

19 **Q. Okay.**

20 **A. Shortly meaning less than a week.**

21 **Q. And when was she protesting for her**  
22 **mother's release?**

23 **A. When? You said when?**

24 **Q. Yes.**

25 **A. Yeah, this was in 2017.**

1           **Q. I'm looking for the time between the**  
2 **protest and her arrest, do you know that?**

3           A. Oh. I don't recall off the top of my  
4 head.

5           **Q. Did CARW consider any other potential**  
6 **reasons that she may have been selected for**  
7 **enforcement?**

8           A. No.

9           **Q. And do you know her current status?**

10          A. I don't. I know that she was denied  
11 for DACA, she was eligible, but she was denied.  
12 And so that's something that is also very  
13 disappointing and I would question, but I don't  
14 know what her current status is.

15          **Q. Okay and to be clear, you're not**  
16 **claiming that ICE denied her DACA petition,**  
17 **correct?**

18          A. No. No.

19          **Q. Okay David Martinez Garcia, what is**  
20 **CARW's understanding of his alleged speech and**  
21 **alleged targeting?**

22          A. Yeah. I remember when this one  
23 happened, and this was last year. And this was  
24 someone who was protesting detention conditions  
25 and he was threatened with solidarity, solitary

1 confinement unless he ended his hunger strike and  
2 began to eat. And he said that he would eat in  
3 that case, he preferred to end the strike and not  
4 go to solitary confinement, and the, the CO's  
5 refused to provide him with food after that.

6 Q. Where was he detained?

7 A. Sorry?

8 Q. Where was he detained?

9 A. This was at the Northwest Detention  
10 Center in Tacoma, Washington.

11 Q. Okay so when you referred to CO's, you  
12 were referring to people employed by the GEO  
13 Group?

14 A. This is, yeah, yeah, as far as I know  
15 it was GEO Group officials, but I could be  
16 incorrect about that.

17 Q. Okay. Okay.

18 A. Yeah.

19 Q. And do you know anything about Mr.  
20 Martinez Garcia's current status?

21 A. I don't.

22 Q. Melesio Morales Mata.

23 A. Mm-hmm (indicating affirmatively.) Yes.

24 Q. What is CARW's understanding of his  
25 alleged speech and targeting?

**CERTIFICATE OF REPORTER AND SECURE ENCRYPTED  
SIGNATURE AND DELIVERY OF CERTIFIED TRANSCRIPT**

I, **GLORIA MORALES**, Notary Public, do hereby  
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stenographic and/or mechanical means, that same was  
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This transcript and certificate have been digitally  
signed and securely delivered through our encryption  
server.

IN WITNESS HEREOF, I have here unto set my hand  
this 31ST day of AUGUST, 2023.



**GLORIA ISABEL MORALES**

Court Reporter / Notary

Notary Registration Number: 2430654

My Commission Expires: 12/13/2026